

GENERAL DYNAMICS
Ordnance and Tactical Systems
Munition Services

RCAP RECEIVED

AUG 19 2010

August 13, 2010

Daniel R. Schuette, Director
MDNR, Division of Environmental Quality
P.O. Box 176
Jefferson City, MO 65102

RE: Incident Involving Hazardous Waste
EPA ID # MOD985798164

Dear Mr. Schuette

Please be advised that EBV Explosives Environmental Company dba General Dynamics Ordnance and Tactical Systems Munition Services (GD-OTS MS) had an incident involving hazardous waste at 8:17 am on July 20, 2010 due to a fire in the transfer room of the Propellant Thermal Treatment Building. There were no injuries. The Contingency Plan was not activated because the fire was out in less than 1 minute.

GD-OTS MS did not notify MDNR immediately since the Emergency / Contingency Plan was not implemented since the fire burned itself out so quickly. The incident was contained within the building, the building design and processed functioned as designed and at no time was any of the public at risk. For these reasons, GD-OTS MS did not notify MDNR based on General Permit Condition II. In the future, GD-OTS MS will promptly notify MDNR of any incident involving hazardous waste.

Incident Details

The fire started in the feed system to Propellant Thermal Treatment Chamber. An ignited segment was moved into the Feed Chute and jammed. This caused the conveyor inside the Chamber to fail so the next segment that was ignited remained on the conveyor instead of moving into the Feed Chute. The flames from the burning segment hit the next double doors and the temperature increased causing the next segment that was being moved to the Chamber at the double doors to ignite. The hot gases and flames from this segment started the 2 other segments in the Transfer Room, which in turn started the segments on the conveyors in the Saw Rooms.

The incident involved 15 segments which burned in the transfer room and 2 saw rooms, totaling 360 pounds of propellant. The design of the rooms worked as planned containing the incident within the rooms. We are in the process of replacing the wiring and instruments that were damaged in the Transfer Room and Saw Rooms.

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GD-OTS MS has completed a root cause analysis of the incident to determine the cause and from this are implementing a number of changes. GD-OTS MS has developed 18 process improvements as a result of this analysis. These improvements can be summarized as follows:

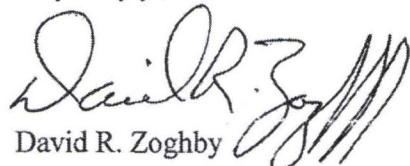
- A.) Changes to the feed chute and feed conveyor in the Chamber to drastically reduce potential for jamming and increase the reliability;
- B.) Improvements to the double door system on the Chamber including the addition of a third insulated door inside the Chamber to protect the double doors used for sealing the Chamber from the flame from the ignited segment;
- C.) Reduction in the staging of the segments from 15 currently to 3 with only 1 segment in the Transfer Room and 1 segment in each Saw Room;
- D.) Replacement of the current isolation doors between the Transfer Room and Saw Rooms with new units enclosing the entire conveyor to completely seal the openings;
- E.) Installation of temperature monitoring on the Chamber double doors with either thermocouples or infrared cameras to allow the operator to identify a potential operational issue before it becomes a problem;
- F.) Improvements to the camera systems in the Chamber to keep the lens clean and improve the visual monitoring of the feed conveyor and ignition system.

GD-OTS MS will update the Operation, Maintenance, Startup, Shutdown, and Malfunction Plan to incorporate these change and operating/troubleshooting lessons learned. This update Plan will be submitted to MDNR as a Class 1 Permit Modification before restart.

GD-OTS MS is implementing these change and plan to resume operation in mid September.

If you have any questions or concerns please feel free to contact Robert Guy or myself.

Very truly yours,



David R. Zoghby
Senior Director of Marketing

cc: EPA Region 7